

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

NEW YORK, NY
TYSONS CORNER, VA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ
BRUSSELS, BELGIUM
AFFILIATE OFFICES
JAKARTA, INDONESIA
MUMBAI, INDIA

FACSIMILE
(202) 955-9792
www.kelleydrye.com

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TODD D. DAUBERT
DIRECT LINE (202) 955-9788
E-MAIL: tdaubert@kelleydrye.com

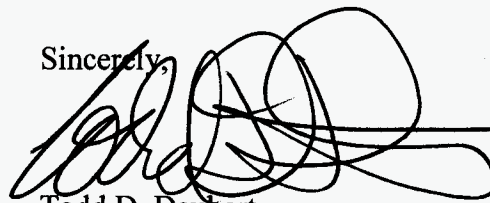
Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: **WC Dockets Nos. 05-196 and 04-36**
Compliance Letter

Dear Ms. Dortch:

MCC Telephony, Inc. ("MCC Telephony"), by its attorneys, hereby respectfully files the attached "Compliance Letter" in accordance with the requirements set forth in the Federal Communication Commission's Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005). Please feel free to contact the undersigned if you have any questions or need additional information.

Sincerely,



Todd D. Daubert,
Counsel for MCC Telephony, Inc.

Attachment

MCC Telephony, Inc.
Interconnected VoIP 911 Compliance Letter
WC Dockets 04-36 and 05-196

MCC Telephony, Inc. ("MCC Telephony") submits the following 911 Compliance Letter ("Compliance Letter"), which contains all of the information described in the Federal Communications Commission's ("Commission" or "FCC") Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005) ("Public Notice").

MCC Telephony's 911 Solution

MCC Telephony provides 911 service, in compliance with the rules established in the Commission's *VoIP 911 Order*¹ to 100% of its customers.

911 Routing Information/Connectivity to Wireline E911 Network

MCC Telephony's interconnected voice over Internet Protocol service is engineered and provisioned to transmit "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."² MCC Telephony utilizes its CLEC network partner Sprint to provide interconnection to the Wireline E911 Network in compliance with paragraph 42 of the *VoIP 911 Order* in those areas where selective routers are used. Sprint establishes interconnection trunks to the incumbent local exchange carriers in each rate center where MCC Telephony offers voice service and the interconnection includes connections to selective routers serving area Public Safety Answering Points ("PSAP"). As of November 28, 2005, MCC Telephony is indirectly interconnected with 42 Selective Routers.

Transmission of ANI and Registered Location Information

MCC Telephony's service and network is provisioned to transmit, via the Wireline E911 Network, the 911 caller's registered location and automatic numbering information ("ANI") to all answering points that are capable of receiving and processing the information.³ MCC and Sprint have integrated their networks so that an MCC

¹ *IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005) ("VoIP 911 Order").

² *Public Notice, Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 at 3 (rel. Nov. 7, 2005) ("Public Notice").

³ As of November 28, 2005, MCC is aware of only one temporary and very limited circumstance pursuant to which the ANI and Registered Location Information for 23 service lines may not be transmitted to a PSAP that is capable of receiving and processing such information. Specifically, with respect to 23 service lines, MCC, Sprint and an incumbent carrier have experienced difficulty

subscriber's ANI is transmitted to PSAPs capable of receiving it via Sprint's interconnection to the Wireline E911 Network and the subscriber's Registered Location is available to PSAPs capable of receiving such information through the appropriate ALI database.

As of November 28, 2005, 89% of the answering points within MCC Telephony's service area are capable of receiving and processing ANI and registered location information. Of MCC Telephony's customers, 98.2% reside in areas where their registered location information and ANI may be transmitted to answering points capable of processing that information.

911 Coverage

MCC Telephony has achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all of its service areas by November 28, 2005.

Obtaining Initial Registered Location Information

MCC Telephony has obtained the registered location information for all of its customers, in compliance with the *Commission's VoIP 911 Order*. MCC Telephony has always obtained a prospective subscribers' service address in advance of installation and pre-validated the address provided against the Master Street Address Guide ("MSAG") before dispatching a technician to install the service at that address. On July 29, 2005, MCC Telephony mailed an E911 Advisory to each of its existing Fixed VoIP customers. In this advisory, MCC Telephony informed its customers that, among other things, each customer must verify that it has provided MCC Telephony with a correct service address (*i.e.*, registered location information), and that customers must contact MCC Telephony if they wish to transfer service to a new service address in order to arrange a new installation at the new address. The advisory further explained that, if the service address that the customer provided MCC Telephony contained an error, calls made to 911 emergency services could be routed to emergency personnel who would not be able to assist the caller. In order to facilitate corrections or requests for transfer of its customers' registered service locations, MCC Telephony provided a toll free number. New customers have undergone the same process for obtaining and validating a registered location and have received a similar E911 advisory. To date, MCC Telephony has obtained the registered location of 100% of its customers.

Obtaining Updated Registered Location Information

At this time, MCC Telephony offers interconnected VoIP services only on a fixed basis. As such, customers must contact MCC Telephony whenever they wish to establish a new service address, at which time MCC Telephony would gather registered location

in passing ANI and Registered Location information in two rate centers through the Wireline 911 Network in the incumbent's service territory, initially due to router capacity issues and over the past week due to router programming difficulties. The affected subscribers have been informed of the limitation and offered a choice of switching service. We expect to have the issue resolved within one week.

information from the customer using the same procedures that apply to new customers. Moreover, in order to facilitate collection and verification of its customers' registered service locations, MCC Telephony has established a toll free number that customers can call using the same equipment they use to access their interconnected VoIP service.

Technical Solution for Nomadic Subscribers

At this time, MCC Telephony does not offer nomadic interconnected VoIP services.